UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS

CASE NO. 05-10059-DPW

UNITED STATES

VS.

CHAD BENJAMIN

**PARTIES' JOINT MOTION FOR EXTENSION OF TIME FOR FILING
SUPPLEMENTAL PLEADINGS RELATIVE TO DEFENDANT'S MOTION TO
SUPPRESS AND TO RESCHEDULE THE FURTHER HEARING PRESENTLY
SCHEDULED FOR APRIL 27, 2006**

Now come the parties in the above captioned matter and hereby move this

Honorable Court for an order granting them an extension of thirty (30) days to May 14,

2006 to file supplemental pleadings as it relates to the defendant's Motion to Suppress

hearing and to reschedule the hearing set for April 27, 2006 for closing arguments on this

matter.

In support of the within motion the parties aver that;

1.   Supplemental filings are presently due to be filed on April 14, 2006. A further

hearing on this matter is presently scheduled for April 27, 2006.

2.   As of this filing the parties have yet to receive a complete transcript of the

proceedings which is the basis of the April 27th hearing. As of April 11th the

parties have been advised that the second day's transcript is complete however the

first full day of arguments, which was conducted on December 8, 2006 have yet

to be completed.

3.   Due to the voluminous nature of the transcripts when completed the parties are

requesting that the filing deadline be extended and the hearing date also be

rescheduled to allow sufficient time for;

A.   The transcripts to be completed and reviewed by counsel for the parties.

B.   A review of said transcripts and filing of substantive pleadings after

reviewing the same.

WHEREFORE the parties respectfully request that this Court grant them until at

least May 14, 2006 to file any supplemental pleadings to the defendant's motion to

suppress evidence and to reschedule the hearing presently scheduled for April 27, 2006

until such time thereafter that is convenient to the Court's calendar.

Chad Benjamin
By his attorney

/s/ Kevin J. Reddington

Michael J. Sullivan
United States Attorney

/s/ Antoinette E.M. Leoney